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April 25, 2011

Ms. Gina Kirkland
Department of Health and Environmental Control
Water Quality Standards Coordinator
Bureau of Water
2600 Bull Street
Columbia, SC 29201

RE: Proposed Reclassification of Reedy Cove Creek to an
Outstanding Resource Water (ORW)

Dear Ms. Kirkland:

Thank you for alerting the South Carolina Baptist Convention to plans to reclassify Reedy Cove Creek from "Freshwater" (its current designation) to "Outstanding Resource Water."

The South Carolina Baptist Convention understands the need to protect Reedy Cove Creek and is a strong supporter of conservation efforts in the area. That being said, the Convention has a few questions and concerns about the proposed reclassification.

Reedy Cove Creek flows through property the Convention owns in Pickens County. Since 1960, the Convention has operated Camp McCall on that property. Camp McCall is a vital ministry of the Convention, and since that first summer over fifty years ago, thousands of boys of all ages have enjoyed the many opportunities our summer camp offers. Our campers come from throughout the state to learn more about God in one of the most beautiful areas our state has to offer. Activities include a natural swimming area (McCall RA Camp), kayaking, canoeing, water slides, swimming, and other activities that revolve around the camp's central natural asset, an eight acre lake we call "Lake Chillywater."

Lake Chillywater is essential to the operation of Camp McCall. Without it, the camp would lose many of its most popular activities, and the camping experience would simply not be the same. We are concerned about the effect this reclassification could have on Camp McCall's continued operations and future development. The Convention has been a good steward of its land, as demonstrated by the following recent actions:

1. The Convention removed the sewage package treatment plant on its property in 2008 and absorbed all of the costs associated with doing so.
2. The Convention cooperated with the Department of Natural Resources and Partners for Trout in allowing the installation of the cold water discharge for Lake Chillywater, a modification that did not benefit the Camp in any way.

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3. The Convention planted a natural area adjacent to Reedy Cove Creek above Lake Chillywater, resulting in the loss of one acre of soccer field.
4. The Convention bought additional land on the ridge tops approximately ten years ago to prevent commercial development.

The “Frequently Asked Questions” in the bulletin DHEC provided addresses many of our concerns. It gives us the impression that this reclassification will have no effect whatsoever on Camp McCall’s operations. The Convention would like to support the reclassification provided it can be assured existing uses and future expansions essential to Camp McCall’s mission are not restricted. Thus, we wish to point out several areas of special concern and confirm the planned reclassification will not have any adverse impact on them and request clarification of the issues described below:

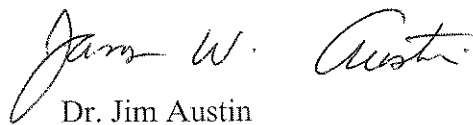
1. In 2008 Camp McCall closed its treated-wastewater facility (which discharged directly into Reedy Cove Creek) and transitioned to an alternative method of wastewater treatment. We understand the reclassification will prohibit future wastewater discharge directly into the creek. We do not have a problem with that as long as the current method of wastewater treatment is allowed to continue. The current method is a septic system with an extensive in-ground drain field on the property. The Convention’s right to use, operate, maintain, and possibly one day replace the septic system with a comparable system needs to be preserved. Without it, Camp McCall would have to close. Will the reclassification have any effect at all on the Convention’s use, operation, maintenance of the current septic system and, if required, any eventual replacement of the current septic system with the same or a comparable system?
2. Many camp activities use Lake Chillywater. They include swimming, canoeing, kayaking, water sports, and several water slides. These activities are among our campers’ favorites, and we want to ensure that those activities can continue without change. Will these activities be affected in any way by the reclassification?
3. The Convention needs to be allowed to maintain Lake Chillywater, its dam, and the cool water discharge. This includes the right to dredge the lake. Sediment accumulates in Lake Chillywater over time, and the Convention needs to be able to dredge the lake as required. Will the reclassification in any way affect the Convention’s maintenance of the lake, the dam, and the cool water discharge, including any dredging of the lake to remove sediment? Will the reclassification impose any new regulations on the maintenance of Lake Chillywater, its dam, and the cool water discharge?
4. Storm water from the Camp McCall area currently discharges into Reedy Cove Creek. Will the proposed reclassification affect that discharge in any way? We wish to ensure that can continue.

5. The Convention periodically harvests timber from its property, and we wish to confirm that can continue at the Convention's discretion, and without any new restrictions imposed by the reclassification. Will the proposed reclassification affect timber harvesting in any way?
6. Issues have surfaced in the past with the temperature of the water discharged into Reedy Cove Creek from Lake Chillywater. Being a shallow lake, the temperature of the water flowing from Lake Chillywater is warmer than the water naturally flowing into Lake Chillywater from Reedy Cove Creek. A few years ago, a cool water discharge outlet was installed on Lake Chillywater. We want to be sure the reclassification will not require any further modifications to water being discharged from Lake Chillywater. Will the proposed reclassification impose any new requirements or limitations on water being discharged from Lake Chillywater into Reedy Cove Creek?
7. While no extensive development plans are currently being considered for Camp McCall, the Convention wants to be able to maintain its current facilities, expand or replace current structures, and construct new buildings as the Camp's needs dictate. Will the proposed reclassification impose any limitations whatsoever on Camp development? Will the proposed reclassification require any modifications to existing structures on the property, or in any way impact the maintenance of those structures?
8. Several existing camp buildings are very close to the banks of the creek and Lake Chillywater. If the proposed reclassification requires a wider buffer between buildings and the banks (see item 7, above), will these buildings be grandfathered in and thus not considered violations of any setback, buffer or other requirements? The Convention wants to ensure no buildings will have to be torn down, relocated, or modified to satisfy some new regulation.
9. Will the proposed reclassification impose any new regulations on the Convention and the operation of Camp McCall? We want to be absolutely certain that all present uses of the property and all structures on the property can remain, be maintained, or even replaced if the reclassification is approved.
10. While there are no plans to sell the Camp McCall property, the Convention wants to ensure the reclassification does not place any restrictions on the marketability and development of the property for uses other than as a summer camp. Will the proposed reclassification impose any such restrictions?
11. The Convention needs to otherwise retain all riparian rights the law grants owners of property on the banks of a watercourse. Will the proposed reclassification affect those riparian rights in any way?

Please send us a written response to these questions and otherwise confirm that the reclassification of Reedy Cove Creek from "Freshwater" to "Outstanding Resource Water" will not have any impact on the above issues or the continued operation of Camp McCall.

Please feel free to give me a call if you have any questions or comments concerning the Convention's position. We ask that this letter also be made part of the record at the hearing scheduled for April 26, 2011.

Sincerely,

A handwritten signature in black ink that reads "Jim W. Austin". The signature is written in a cursive, flowing style.

Dr. Jim Austin
Executive Director-Treasurer
South Carolina Baptist Convention